

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BANK OF COMMUNICATIONS,
NEW YORK BRANCH,

Case No. 07 CV 4628

Plaintiffs,

**AFFIDAVIT IN SUPPORT OF
MOTION FOR SANCTIONS**

- against -

OCEAN DEVELOPMENT AMERICA, INC.,
HONGMING LI a/k/a MICHAEL LI and
XIAOMING ZHANG

Defendants.

STATE OF NEW YORK)
)ss:
COUNTY OF NEW YORK)

HONG TU, being duly sworn, deposes and says;

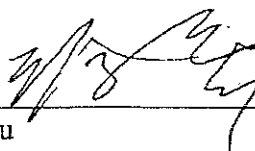
1. I am the General Manager of Plaintiff, Bank of Communications, New York Branch
(the "Bank").

2. I submit this affidavit in support of Plaintiff's motion for sanctions against the
Defendants, in the amount of the attorney's fees incurred and paid by the Bank to its counsel, Wu
& Kao.

3. From books, documents and records kept by the Bank in the ordinary course of
business, to date, Plaintiff's counsel has charged the Bank \$21,178.50 for its reasonable attorney's
fees, from the commencement of this federal court case to present, which amount has been fully paid
by the Bank to Wu & Kao.


WHEREFORE, Plaintiff respectfully requests that this Court issue an order awarding
sanctions against Defendant and in favor of Plaintiff in the amount of \$21,178.50, and for any such
other relief that the Court deems just and proper.

Dated: New York, New York
August 20, 2008



Hong Tu

Sworn to before me this
20th day of August, 2008



Notary Public

SIU H. LI
Notary Public, State of New York
No. 01LI5061451
Qualified in Queens County
Commission Expires June 10, 2010